

National Park Service  
Heritage Preservation Assistance Programs  
Historic Preservation Grants Division

## GUIDANCE FOR COMPLETING THE NATIONAL PARK SERVICE ANNUAL PRODUCTS REPORT FOR CLGs

### 1. What is the purpose of this report?

The report data that you provide each year contribute to documenting those achievements of the national historic preservation partnership that CLGs accomplish. The data that we request all relate to key program elements for every CLG; i.e., the designation and protection of historic and prehistoric properties. Except for the CLG inventory (which is a Federal requirement), this report focuses on CLG accomplishments under local laws and programs. We have information from other sources concerning CLG contributions to historic preservation under Federal and State law and programs. This report's data provide critical information and documentation for the Administration's and the Congress' budgetary decision-making process under the Government Performance and Results Act (GPRA). On a long-term basis, we plan to post on the web the results of the report. For your use and perusal, we have posted on our web site (<http://www.nps.gov/history/hps/clg/index.htm> -- click on the "Find CLGs and Stats" button) results from FY 1997 through FY 2007. We will post this year's results as soon as possible. For data entered on-line, the posting should be instantaneous once the system is fully operational. In this way, we can share information about your program and achievements with your colleagues and with the public. We also expect that this information will be useful to you and to your colleagues in your State Historic Preservation Office. This information can be helpful in explaining to your local and State government decision-makers what you have accomplished for historic preservation during the year.

### 2. Who can use the on-line data entry option for submitting this report?

Right now, other than National Park Service staff, only each State's CLG Program Coordinator has the option of using the on-line data entry option for this reporting. We will be testing the system for the next few years. There is a data security issue at play here also. With NPS' limited staffing available for this purpose, it is a lot easier to assign and administer passwords for 50 State CLG Coordinators than it would be to handle passwords for more than 1,600 CLGs. As the technology gets better and we gain more experience with the use of the system, we will reexamine the issue of on-line data entry.

### 3. Are there any definitions or special instructions that I need to know to properly complete this form?

"Historic Property" means a property that, regardless of government action (i.e., whether it is listed or not), meets the eligibility criteria for listing in your local register or for listing in the National Register of Historic Places. A historic property can include archeological as well as above-ground resources. Other properties are outside the purview of this questionnaire. In some communities, this term is equivalent to "historic resource," "historic landmark," or some other similar term.

"Designation" as used in this document means that the local government has officially identified the property as historic. Most CLGs have two levels of designation. That is, one level of designation is an evaluation of significance that carries no consequences. CLGs often refer to this as "the inventory" or "the survey." The other level of designation carries consequences such as eligibility for benefits or being subject to design review for proposed changes. CLGs often refer to this level of designation as "the local register," "the landmarks list," etc.

“Protection” as used in this document means that because of government action, a historic property retains those elements that make the property historic.

The “Federal fiscal year” begins on October 1 and ends the following September 30. For example, Federal Fiscal Year 2008 began on October 1, 2007, and ended on September 30, 2008. If your local government operates on a different time frame for its fiscal year, please convert your yearly product totals to the Federal time frame. If your yearly product totals do not lend themselves to conversion to the Federal fiscal year, please provide your best estimates based on prorating the product totals or using another method. For example, if your government’s Fiscal Year 2008 began on July 1, 2007, and ended on June 30, 2008, three months (or 25 percent) of the year fall in Federal Fiscal Year 2007 and 9 months (or 75 percent) fall in Federal Fiscal Year 2008. Consequently, you would report 25 percent of your local FY 2008 totals as a part of the FY 2007 GPRA Annual Report and 75 percent in the FY 2008 GPRA Annual Report.

If your CLG offered the program during the reporting period, please fill in each blank with a number. Insert “0” if the subject matter applies, but there was no activity during the last completed Federal fiscal year. If the subject matter does not apply to your local government’s historic preservation programs (i.e., you answered “NO” to the “did you have the program” question, leave the related “historic properties” question’s blank empty. For example, you should leave the blank empty for question 3b if your government does not have a local government preservation tax incentives program and you answered “NO” for question 3a. For every local program for which you entered a “NO” in question 2a, 3a, 4a, 5a, or 6a, we would expect to see an empty blank in question 2b, 3b, 4b, 5b, or 6b.

**4. The on-line form has a little different appearance than the hard-copy form or the form used in past years. Why is that?**

Most of the differences are due to creating an on-line data entry option and how that system works.

A hard copy or e-mail version of the form needs instructions on where to send the completed form; guidance that is clearly not needed for the on-line version.

The database that supports the on-line data entry option does not allow for the entry of both alpha entries and numeric entries in the same blank. In other words, the new system would not allow for the entry of “N.P.” (No Program) in any of the blanks asking for the number of historic properties. To get at the NP situation, we added in the “did you have this kind of local program” questions of the sort that we have traditionally asked as a part of the Cumulative Baseline Questionnaire. The addition of these questions did not work well with the former grammatical structure of the Annual Report, so we revised the wording and the structure of the form. The unanticipated fringe benefit of these revisions is that a CLG no longer needs to send in a new Baseline Questionnaire merely to report a change in its local government historic preservation-related program area offerings.

To preserve the ability to add a narrative note, on the on-line version of the form we have added a narrative box that State CLG Coordinator or the NPS Program Coordinator can use.

**5. Do we have to use the form that NPS has provided?**

For the on-line version of the form, the answer is “Yes.” For the hard copy or e-mailed version of the form, the answer is “No.” We care more about the content of the data that you provide than we care about the format in which you provide it or the medium by which you transmit it to us. As long as NPS can clearly tell which data relate to which question on the form and you provide information corresponding to every blank on the form, we are satisfied. E-mail messages, spread sheets, State report pages, etc. are all acceptable.

**6. How do I report on historic properties whose protection is not carried out or monitored by my office?**

You don't have to. For the purposes of this inquiry, report only those historic properties whose designation or protection has involved your local government's historic preservation office/commission in some way; e.g., through review, approval, project administration, covenant or easement oversight, etc. or for which your office has the data.

**7. How should I count historic districts?**

Do not count a district as a single property. Count the total number of buildings, structures, sites, or objects that contribute to the significance of the district. If you do not know the number of contributing properties, please provide your best estimate of the number.

**8. We don't use the same terminology that appears on the form and in this guidance. Do we have to change how we refer to things?**

That decision is between you and your State Historic Preservation Office. A national report needs to use national terms that follow Federal statutes and policy. For your own purposes, you should use terms that make sense to you. All we ask is that you know how your terms relate to the national terms because we won't understand the relationship. Therefore, for this report please make the conversion from your terminology to the national terminology.

**9. What is the difference between a "CLG inventory" and a "local register"?**

As a CLG, under Federal law, you already have a CLG inventory, but you might not have a local register. You have a "local register" only if your State's CLG procedures require it and/or your local government has created a registration/designation process under local law. Your community may have given your local register some other name that means a list of locally registered historic properties. In most situations, you can think of historic properties that are listed on your local register as a subset of the historic properties that are included in your CLG inventory. Because of the consequences under local law that usually attend being added to the local register, normally a CLG will have more historic properties in its CLG inventory than it has on its local register. The annual additions to each will vary.

A CLG inventory encompasses everything that you know about the resources within the jurisdiction of the local government regardless of how you got the information. It doesn't matter, for example, if the inventory information was gathered as a part of a State or federally-funded survey. For question 1 on the form, we are interested in the number of CLG inventory properties that are historic properties. Under Federal law, there are no legal consequences when you add property to your CLG inventory. Your local register (or whatever name you give it), on the other hand, usually has consequences under local law. In fact, if your State's CLG procedures require a local registration/designation ordinance, there must be consequences under local law for properties newly added to the local register. Usually, when a historic property is added to a local register, the property becomes subject to some kind of review process and/or becomes eligible for some kind of local benefits. In other words, every historic property that is on the local register is also on the CLG inventory, but not every historic property on the CLG inventory is on the local register.

**10. We don't have anything called a "local inventory" or a "local register," but we do have other lists and overlay zones that indicate historic properties. Should I count those?**

Yes, as long as you can count the number of historic properties that those lists or overlays include. Don't worry about the titles given to the information that you have about historic properties. Use the guidance in the answer to question 9 above, to help you determine where in the report to include the number of

historic properties. In some cases, you should report the number in both the blanks for question 1 and question 2b on the form and in some cases just in the blank for question 1 about CLG inventories.

11. **Last year, due to demolition, we had to remove some properties from both our CLG inventory and our local register. Do you want us to adjust our annual figures for the CLG inventory and local register to reflect those losses?**

No. Just report the number of historic properties newly added to your CLG inventory and/or local register. We don't want to have your successes obscured by your losses. However, if you have readily available an estimate of the number of properties removed during the year, please give us that information in the narrative box. In such a situation, it would also be helpful to provide updated cumulative baseline figures in the following year. For example, the impact of properties demolished during FY 2008 would be reflected in adjusted cumulative baseline figures in the FY 2008 Cumulative Baseline Questionnaire.

12. **Why do you have separate blanks for the number of “designated” and “protected” historic properties throughout this report? Why not just ask for the number of properties in our CLG inventory? In that way, with one question, you could account for all historic properties that have been designated and protected. All of our locally “listed” properties are included on our CLG inventory. All of our properties that have been “protected” in one way or another are also “designated” properties.**

Reporting separately on “designated” historic properties and “protected” properties better represents the historic preservation work that you do. Each time the local government designates a property or (for example) provides financial assistance to a property, that action adds to the protection inherent in being part of your CLG inventory. We wish to give you full credit.

Also, this is the kind of information that citizens in your CLG and your colleagues in other CLGs or local governments want to know. Folks living in a CLG or thinking about moving there may want to know what kinds of historic preservation opportunities exist. Communities that are considering creating historic preservation programs want to know who else has the programs so those wheels don't have to be re-invented. We will make this information available on the Web and upon request. For your use and perusal, we have posted on our web site (<http://www.nps.gov/history/hps/clg/index.htm>) the results from FY 1997 through FY 2007. We will post this year's results as soon as possible. We are seeking this information because it is not available anywhere else on a national basis.

13. **Some historic properties are protected more than once (e.g., tax benefits achieved and permits reviewed). Should I count a property only once or each time that it is reviewed, receives a grant, etc.?**

Count a property each time that it is reviewed, receives a grant, etc. This approach gives you credit for all the protection that you give to a historic property, not just the initial instance. Note that for this reporting you do not have to know or provide a list of what happened to each historic property. What you need to know for this report are total figures for each category; i.e., the total number of properties listed, receiving tax benefits, etc.

14. **For some of our local programs, the main purpose is not historic preservation, but the programs protect historic properties as an incidental consequence. Housing programs are a good example. Should I count historic properties that are protected by those programs?**

Yes. As long as historic properties are protected and your office is involved or has the data, count the properties protected by those programs.

**15. Our historic preservation financial assistance programs (grants, loans, etc.) are not funded every year. Should I report on the properties protected by the program or not?**

Answer “Yes” to question 4a and report on the number of properties in the “grant or loan” blank (question 4b) of the form, if the ordinance authorizing the financial assistance was still in effect during some portion of the reporting year. If the authorizing ordinance was not in effect at all during the reporting year, and your local government requires an authorizing statute for grant programs, answer “No” to question 4a and leave question 4b’s blank empty.

If no authorizing ordinance was involved in the financial assistance program, answer “Yes” to question 4a and fill question 4b’s blank with the number of newly protected properties if the financial assistance program was in effect during the reporting year. Otherwise, leave the blank empty.

For the purposes of the local historic preservation grant or loan blank, count a historic property if preservation work (a.k.a. “bricks and mortar”) is involved. Report elsewhere (e.g., under Acquisition) those properties that your local grants or loans assisted in other ways (e.g., to help a nonprofit organization purchase a preservation easement).

**16. We administer some grants from the State and the staff of the State Historic Preservation Office helps us with some of our locally-funded programs. How should I treat these situations in responding to question 4 on grants and loans?**

Count only historic properties protected through grants supported by funds coming from local government sources. Do not count: 1) grants from Federal (or matching) funds administered by State or local agencies or 2) State government grants. For example, don’t count historic properties that you protect through Historic Preservation Fund CLG subgrants. These are counted elsewhere on State or Federal Government forms. However, if the funds are local, count the benefiting historic properties in this report even if you receive technical assistance from other sources.

**17. Many of our historic preservation accomplishments are achieved through the financial support of the private sector or through non-profit organizations such as the National Trust’s Main Street program. Should we include these achievements in our reporting on the number of historic properties that we protect through grants or loans?**

No. Although we recognize that a large percentage of current historic preservation would not take place without the financial support of non-profit organizations and the private sector, this report is focussing on the achievements of local government historic preservation programs.

**18. What should I count in the “local regulatory program” blank for question 5b?**

For the purposes of the “local regulatory program” blank, include only historic properties for which local laws have provided protection in a regulatory setting; e.g., through a review, permitting, or certificate of appropriateness process. This type of program is often referred to as “review and compliance.” “Review and compliance” refers to the review of permits, plans, applications, etc. to help ensure compliance with local regulatory laws related to the protection of historic properties. Do not count (in this blank) historic properties that local laws have protected through financial incentives (e.g., tax laws) or financial assistance (e.g., grant programs). Report that information elsewhere on the form.

**19. Sometimes we approve/review requests for demolition or make other decisions/recommendations that do not result in the protection of properties. These reviews are a legitimate part of our workload. Should we count these for question 5b on the form?**

No. If it is easy for you to separate out those reviews/recommendations that are likely to result in a historic property's destruction or loss of significance, don't include them in this report. We are trying to

get an estimate of the number of historic property reviews where preservation is a likely result. If it is difficult to separate your regulatory reviews by result, don't worry -- just give us your total figures.

**20. What does “acquisition” include for question 6 on the form?**

“Acquisition” refers to any legally-binding, title-related interest in the historic property that the local government has obtained (or has helped others to obtain) thereby making the property subject to your local historic preservation laws and policies. The interest in the property’s title could be anything ranging from fee simple absolute to an easement. The method of acquisition is not important here. Include in the count any historic property that comes into local government ownership.

**21. Where do I report on publications, brochures, public education, site interpretation, historic plaques and markers, and other historic preservation accomplishments that we have achieved?**

These are not part of this report. While important, for GPRA purposes we have limited the products to those that more directly affect specific historic properties. This reduces the burden in gathering and reporting this data. However, you may include your other accomplishments as part of your periodic reporting to your State Historic Preservation Office (in some States this is required) or, if you wish, directly to us.

**22. What should I do if my office missed a report or we discover that we made a mistake in an earlier report?**

Because of the long-term uses for this information, it will never be too late to provide this report’s information. We hope that you take advantage of opportunities to update the information that we have about your program. You have a choice as to how to accomplish this. You may either provide/correct the earlier report or you may prepare a new cumulative baseline report for a more recent year. For example, if your local government was a CLG during FY 1998 but your office has not responded to any of the subsequent requests for information, you would have the following options. Your first option is to prepare and send us a FY 1997 cumulative baseline response plus an annual report for FY 1998, FY 1999, FY 2000, FY 2001, FY 2002, FY 2003, FY 2004, FY 2005, FY 2006, FY 2007, and FY 2008. You can use this year’s forms by changing the fiscal year. Your second option is to provide questionnaire answers and baseline data through FY 2007 plus a FY 2008 annual report. We have prepared the baseline form for data cumulative through FY 2007. Other combinations of baseline questionnaires and annual reports are also possible.

**23. The questions that you ask relate primarily to CLG workload. Wouldn't it be better to ask how many of our historic properties are still in good condition? In the final analysis, preserving our irreplaceable resources is the true test of our success as historic preservationists.**

If funding and staffing were no object, we would want both workload information and data on the condition of historic resources. One of the aims of this report is to make use of readily available information rather than to create a new workload in gathering and tracking data. Especially for larger CLGs, data on the condition of historic and prehistoric properties often are not readily available. Another purpose of this questionnaire is to gauge the contribution that CLGs make to historic preservation. In assessing a property's condition, without asking the property owner it is difficult to distinguish which parts (if any) of a property's good condition are due to local, State, and/or Federal historic preservation program efforts. CLG workload data on the other hand usually is readily available, readily assignable to CLG efforts, and can be used to draw reasonable inferences about the condition of properties.

**24. In the categories that you ask about, we have done nothing (or very little). Do you want us to send you a report with such low numbers?**

Your report is valuable to us no matter how little you have to report. The annual report only asks six questions involving numbers. Many CLGs respond to the questions by answering "0" or "1." We make no judgements of the quality of your historic preservation program based upon the numbers that you supply in your annual reports. Don't worry about not having much to report for a given year. We think that it is a big deal for any local government to commit in writing to historic preservation by enforcing appropriate laws for the designation and protection of historic and prehistoric properties. We also recognize that the categories that we ask about do not cover all of the CLG's activities.

Small CLGs with not much action in the categories that the National Park Service asks about are just as important as big CLGs with a lot of action. Each year, approximately 700 (out of more than 1,600) CLGs respond to the annual report. We then extrapolate the figures from the reporting CLGs to produce national estimates for all CLGs. Thus, the more CLGs that report, the more accurate the projections will be. Given that there are more small CLGs than big ones, it is important that as many small CLGs as possible report; otherwise our national projections will be too high.

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The National Park Service has sought from OMB clearance for the collection of information associated with the implementation of 36 CFR 61, "Procedures for State, Tribal, and Local Government Historic Preservation Programs." OMB has given its clearance (OMB Control Number 1024-0038) for this set of information collections. NPS and OMB carried out clearance procedures pursuant to the Paperwork Reduction Act of 1995, as amended, (44 U.S.C. 3507 *et seq.*) and the Office of Management and Budget's (OMB's) procedures (5 CFR 1320). This OMB Approval (which expires on May 31, 2011, specifically covers the GPRA Annual Reports for CLGs.

NPS collects the information as part of the process for reviewing the procedures and programs of State, Tribal, and local governments participating in the national historic preservation program and the Historic Preservation Fund grant program. The information will be used to evaluate those programs and procedures for consistency with the National Historic Preservation Act, as amended, (16 U.S.C. 470 *et seq.*) and compliance with government-wide grant requirements. Note that a Federal agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. NPS provides no assurance of confidentiality to respondents with the exception of some location information concerning some properties included in government historic preservation property inventories. Pursuant to Section 304 of the National Historic Preservation Act of 1966, as amended, release of information is tightly controlled when such release could have the potential of damaging those qualities that make a property historic.

The public reporting burden for the collection of this information is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Chief, Historic Preservation Grants (Org. Code 2256), National Park Service, 1849 C Street NW, Washington, DC 20240